Data protection evaluation: Predict / EU GDPR



As part of its product portfolio **DPD Deutschland GmbH** (registered location: Wailandtstraße 1, 63741 Aschaffenburg, Germany, referred to below as **DPD**) offers its so-called **Predict-Services** for consignors and consignees.

With this service, the consignees of shipments from a consignor receive advance information by email or text message (SMS) about the delivery of the shipment and the structure of the delivery process. For this purpose the consignor (shipping customer) provides DPD with the relevant supplementary information, such as the consignee's email address or mobile phone number.

One basis for the transmission of this data to DPD on the part of the consignor is Article 6 (1f) EU GDPR ("Processing of data for the purpose of safeguarding legitimate interests").

Reason: the transmission of the data is implemented in the legitimate interests of both the consignor and DPD as the postal service provider, to avoid incorrect deliveries (which serves to protect postal secrecy) and to ensure customer-friendly determination of the time and place of delivery for the party concerned (consignee). The basis for the processing of the data between consignor and consignee is regularly an order, a contractual or similar relationship with the party concerned in accordance with Article 6 (1b) EU GDPR. In the process DPD functions as service provider (provider of postal services). The transmission of the additional information does not restrict any interests of the party concerned which require protection or that party's fundamental rights and freedoms. The party concerned can reject the processing of this supplementary information at both ends. Predict notifications are not advertising aimed at promoting DPD's own sales or that of an outside company but serve the implementation of the delivery process for goods which have already been ordered.

DPD processes this data exclusively for this purpose and for no other purpose. For purposes of dealing with complaints or invoicing, the data in relation to the individual shipment is recorded and saved in our shipping archives in accordance with statutory provisions relating to archiving periods. Shipping customers (consignors) are responsible for ensuring the correctness of the information provided to DPD about the email addresses and telephone numbers of their customers (consignees), as well as with regard to the correct spelling, syntax and allocation to a specific shipment. If DPD has received instructions from a consignee blocking the transfer of information by email or SMS, DPD is under an obligation to follow these instructions and to terminate the service to the relevant consignee. There will be no message to the shipping customer that this service has been blocked by the consignee

As part of DPD's Predict-Services, consignors can also provide customers with information about themselves in the form of banner advertising. In addition to the company name and address, the customer's banner can contain the company logo, the website URL and a company slogan/claim, but no advertising content that goes beyond this in the form of texts or images. DPD undertakes towards shipping customers not to send any advertising of its own to their customers (consignees).

Consignees who wish to block their email address for the Predict-Service should send an informal notice of cancellation to widerspruch_predictbenachrichtigung@dpd.de indicating their name, address and the email address which is to be blocked. The effect of blocking the email address will be that the consignee will receive no further email notifications from us related to shipments.

Suggested text for instructions in the privacy policies of DPD's shipping customers from 25.5.2018:

"During shipping operations we transmit, on the basis of Art. 6 (1f) of the EU's General Data Protection Regulation, your data (name, address, if necessary email address and/or mobile phone number for notification options and re-directions, together with further shipment-related data) to our shipping partner DPD Deutschland GmbH. You can at any time reject the transmission of supplementary information such as email or mobile phone data both with us [...add customer contact address...] and with DPD [widerspruch_predictbenachrichtigung@dpd.de or, in the case of all parcel notifications, via a link]."